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October 30, 2017

Ms. Maryam Tasnif-Abassi
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630

SITE: FORMER AGRICULTURAL PARK
7020 CREST AVENUE
RIVERSIDE, CALIFORNIA

RE: REQUEST FOR ALTERNATE SOIL CLEANUP GOAL

Dear Ms. Tasnif-Abassi:

This letter is provided as a request to revise the soil cleanup goal currently being used at the former Agricultural Park (Ag Park) in Riverside, California. In July 2017, Peter Garcia of the Department of Toxic Substances Control (DTSC) had a conversation with Robert Beers of Friends of the Riverside Airport (FRA) regarding soil cleanup levels. As of today, the soil removal work at the site is almost complete. Over 12,277 truckloads (approximately 282,371 tons) of soil have been removed from the site to meet the human health protective cleanup goals. Extensive soil removal has been conducted at the site to remove soil that does not meet the cleanup goals and detailed soil sampling of each lot has been conducted to ensure that the remaining soil meets the cleanup goals.

As a result of the July 2017 discussion, it was proposed that for confirmation soil samples collected at 10 feet or deeper below final pad elevation of the future housing lots, a cleanup goal of 1.0 milligram per kilogram (mg/kg) for polychlorinated biphenyls (PCBs) would be acceptable and protective of human health. The 1.0 mg/kg cleanup goal aligns the removal work with the US Environmental Protection Agency (EPA) health protective goal of 1.0 mg/kg or less. The current cleanup goal of 0.23 mg/kg is the residential soil EPA Regional Screening Level (RSL) for PCBs and is highly conservative.

The current goal of 0.23 mg/kg will continue to be assigned to soils present from 0 to 10 feet below ground surface (bgs). The proposed cleanup goal of 1.0 mg/kg will be used for soils 10 feet bgs or greater and for soil in the proposed roadways that will be covered with pavement following development of the property. This is the goal used by the EPA for site cleanup under the Toxic Substances Control Act (TSCA) and is a human health protective goal. In addition, all fill lots will have a minimum of three feet of certified clean, import soil placed over each lot following the soil removal work and prior to beginning construction on the properties.

The request for an alternate cleanup goal for soils 10 feet bgs or deeper assumes that a resident could excavate a point in their lot down to 10 feet bgs when installing an in-ground swimming pool. This scenario was presented at a Riverside City Council meeting and has been incorporated into the cleanup methodology for the site. A scenario where a resident is digging greater than 10 feet bgs is highly unlikely, since the deepest point that they may potentially dig on a lot is 10 feet bgs. In this scenario, commercial/industrial (excavation) workers are likely the only receptors that would be in contact with soils greater than 10 feet bgs. Also, the amount of soil exposed at a depth of greater than 10 feet bgs, in addition to the time and duration of exposure, would be extremely limited. If soils located deeper than 10 feet bgs have a PCB concentration greater than 0.23 mg/kg, but less than 1.0 mg/kg, these concentrations are still protective of human health as implemented by the EPA under TSCA cleanup.

The request for an alternate cleanup goal for soils located beneath the proposed roadways assumes that future construction/maintenance workers will come in contact with soils during maintenance work associated with the roadways or utilities located beneath the roadway. It also assumes that there is no exposure pathway for future residents. In addition, the amount of soil generated during maintenance is typically limited to small areas and a short exposure duration (i.e. less than a month). If soils located beneath the proposed roadways have a PCB concentration greater than 0.23 mg/kg, but less than 1.0 mg/kg, these concentrations are still protective of human health as implemented by the EPA under TSCA cleanup.

Considering the limited risk associated with soil at or below 10 feet bgs, and soil in proposed roadways that will ultimately be covered with pavement, and being consistent with the EPA TSCA cleanup goals, it is requested that a cleanup goal of 1.0 mg/kg be allowed for soil at or below 10 feet bgs, and soil in proposed roadways as the Ag Park cleanup effort continues.

If you have any questions regarding this correspondence, please contact David Lennon at (949) 341-7458.

Sincerely,



David Lennon
Principal Consultant



Ross Surrency, PG
Senior Project Geologist

cc: Greg Neal, DTSC (electronic copy)
Sarah Ziff, EPA (electronic copy)

